



United States Environmental Protection Agency
Region 1 – New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

FEB 02 2018

**Certified Mail
Returned Receipt Required**

Vern Jones, Facility Manager
Joseph Freedman Company, Inc. NPDES Permit No. MAR053576
115 Stevens Street
Springfield, MA 01104

Re: Request for Information Pursuant to Section 308 of the Clean
Water Act (33 U.S.C. § 1318), Docket No. CWA-308-R01-FY18-30

Dear Mr. Jones:

Facilities subject to the monitoring requirements identified in the 2015 National Pollutant Discharge Elimination System ("NPDES") general permit for stormwater discharges from industrial activity, also referred to as the 2015 Industrial Stormwater Multi-Sector General Permit ("MSGP"), are required to submit their sampling results to EPA electronically using EPA's NetDMR system no later than 30 days after receiving their complete laboratory results. Facilities which do not have a discharge or who are unable to obtain a sample during the monitoring period must similarly use NetDMR to submit their Discharge Monitoring Reports ("DMRs") with the appropriate "no data indicator" or "NODI" code to EPA no later than 30 days after the end of the reporting period.

It appears that your facility has not complied with the reporting requirements of the MSGP. EPA has sent several Notice of Non-Receipt emails to Joseph Freedman Company, Inc. to notify it of the overdue DMRs and has received no response. Joseph Freedman Company, Inc. is hereby required, pursuant to Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C. 1318(a), to respond to this Request for Information (the "Request") within **the time frames indicated in this letter**.

1. Within fourteen (14) days of receipt of this Request, Joseph Freedman Company, Inc. must complete and submit all missing DMRs required under the MSGP. DMRs must be submitted to EPA using NetDMR for all relevant monitoring periods for which the

facility received coverage under the MSGP. NetDMR must also be used to report any failure to monitor during the regular reporting period using one of the available "no data indicator" codes (see Attachment #1). When weather conditions prevent the collection of samples according to the relevant monitoring schedule, the facility must take a substitute sample during a subsequent qualifying storm event and submit the new information as a corrected DMR through NetDMR. Facilities shall send an email to R1.NetDMR@epa.gov to notify EPA when all of the missing DMRs have been submitted and include with this email an explanation of why the original sample was not collected and reported in a timely manner. Facilities may also contact R1.NetDMR@epa.gov if they need help establishing an account in NetDMR or submitting their DMRs through NetDMR.

Thank you for your assistance and timely response to this Request. If you have questions regarding this Request, please contact Diane Boisclair of my staff at 617-918-1762.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Chow", with a stylized flourish at the end.

James Chow, Manager
Technical Enforcement Office
Office of Environmental Stewardship

Enclosure/EPA No Discharge Indicator Codes

cc:

John Freedman, President, Joseph Freedman Company, Inc.
Diane Boisclair, EPA (electronically)
Neil Handler, EPA (electronically)

No Data Indicator (NODI) Codes

<u>Name</u>	<u>Description</u>
1	Wrong Flow
2	Operation Shutdown
3	Special Report Attached
4	Discharge to Lagoon/Groundwater
5	Frozen Conditions
7	No Influent
8	Other (See Comments)
9	Conditional Monitoring - Not Required This Period
A	General Permit Exemption
B	Below Detection Limit/No Detection
C	No Discharge
D	Lost Sample/Data Not Available
E	Analysis Not Conducted/No Sample
F	Insufficient Flow for Sampling
G	Sampling Equipment Failure
H	Invalid Test
I	Land Applied
J	Recycled - Water-Closed System
K	Natural Disaster
L	DMR Received but not Entered
M	Laboratory Error
N	Not Constructed
Q	Not Quantifiable
S	Fire Conditions
V	Weather Related
W	Dry Lysimeter/Well
X	Parameter/Value Not Reported
